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WELLS FARGO BANK, N.A.

IN THE UNITED STATES DISTRICT COURT
THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

RON LOMBOY,

Plaintiff,

v.

WELLS FARGO BANK, NATIONAL
ASSOCIATION; and DOES 1 through 10,
inclusive,

Defendants.

Case No. 4:24-cv-04168-HSG

**JOINT STIPULATION TO CONTINUE THE
FACT DISCOVERY CUT-OFF DATE;
ORDER (as modified)**

Trial Date: November 3, 2025

JOINT STIPULATION AND ORDER

Plaintiff Ron Lomboy (“Plaintiff”) and Defendant Wells Fargo Bank, N.A. (“Defendant”) (collectively, the “Parties”), through their respective counsel of record, have reached the following Joint Stipulation to Continue the Fact Discovery Cut-Off Date based on the recitals set forth below, and respectfully seek an Order of the Court thereon:

RECITALS

WHEREAS, on June 14, 2024, Plaintiff filed his Complaint to initiate this action in Contra Costa County Superior Court, and Defendant removed Plaintiff’s Complaint to this Court on July 11, 2024;

WHEREAS, the jury trial in this action is currently set for November 3, 2025;

WHEREAS, on October 25, 2024, the Court issued its Scheduling Order;

WHEREAS, the Parties have been diligently conducting discovery, including exchanging written discovery, conducting depositions (including conducting Plaintiff’s deposition and Defendant’s Person Most Knowledgeable Deposition);

WHEREAS, following a meet and confer between Counsel following written discovery exchange, Defendant is in the process of conducting an extensive ESI discovery review which requires the processing of approximately 100 GB of data;

WHEREAS, Plaintiff anticipates taking approximately six additional fact witness depositions following the completion of Defendant’s ESI discovery production;

WHEREAS, the Parties mediated this matter with Lisa Krakow, Esq. on February 11, 2025, but were unable to come to a resolution of this case;

WHEREAS, the Parties have met and conferred and have stipulated to a short continuance of the fact discovery cut-off date and expert-related deadlines by approximately 60 days to allow discovery to continue to proceed efficiently;

WHEREAS, a continuance of the fact discovery cut-off and expert-related deadline dates will not be prejudicial to the Parties;

WHEREAS, the Parties are making this request in good faith and not for purposes of delay.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the respective attorneys of record for Plaintiff and Defendant, as follows, that the fact discovery cut-off date is continued from April 24, 2025 to June 23, 2025; the deadline to exchange opening expert reports is continued from May 9, 2025 to July 8, 2025; the deadline to exchange rebuttal expert reports is continued from May 27, 2025 to July 25, 2025; and the expert discovery cut-off date is continued from June 10, 2025 to August 8, 2025.

IT IS SO STIPULATED.

Dated: February 19, 2025

AK LAW

By: /s Ayse Kent

AYSE KENT

Attorney for Plaintiff

RON LOMBOY

Dated: February 19, 2025

SHEPPARD MULLIN RICHTER & HAMPTON LLP

By: /s/ Raymond J. Nhan

Paul Berkowitz

Raymond Nhan

Attorneys for Defendant


WELLS FARGO BANK, N.A.

ORDER

The Court, having read and considered the Parties' Joint Stipulation, and finding good cause appearing therefore, the above stipulation is adopted, and the fact discovery cut-off is continued from April 24, 2025 to June 23, 2025; the deadline to exchange opening expert reports is continued from May 9, 2025 to July 8, 2025; the deadline to exchange rebuttal expert reports is continued from May 27, 2025 to July 25, 2025; and the expert discovery cut-off date is continued from June 10, 2025 to August 8, 2025. All other deadlines and hearing dates previously set by the Court at Dkt. No. 23 remain in place and will not be moved, even though any dispositive motions now will need to be filed before the conclusion of fact and expert discovery.

IT IS SO ORDERED.

Date: 2/20/2025


Honorable Haywood S. Gilliam, Jr.
United States District Judge